

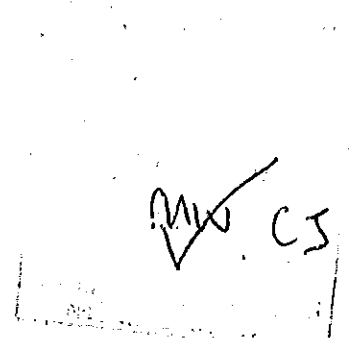


HUNTER ARCHITECTURE

Our Ref: HH/894.01

Date: 3rd March 2014

Plans and Research Team
Scottish Borders Council
Council Headquarters
Newtown St Boswells
TD6 0SA



Dear Sir

Development Plan Scheme

I write to object to the above development plan where it refers to the village of Stow. In My view, land to the south of Wedale View should be included for future housing development. I attach a main issues report which was prepared by myself in conjunction with Cameron Planning.

Please do not hesitate to contact myself should you require any further information regarding this matter.

Yours faithfully



Hamish Hunter.

encl:-



Chartered Institute of
Architectural Technologists

Miller Family

Land at Stagehall, Stow, Galashiels.

Response to Scottish Border's Council:

Local Development Plan:

Main Issues Report.

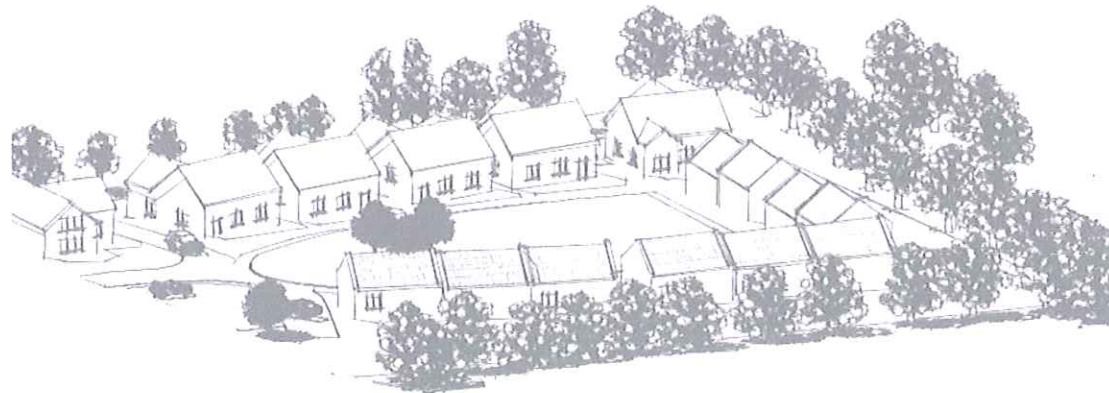
Planning Supporting Statement

 **Cameron Planning**

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Introduction

Cameron Planning has been invited by Andy Miller on behalf of the Miller family to lodge representations to Scottish Border's Council's Local Development Plan Main Issues Report in respect of land in their ownership at Stagehall, Stow.

The Main Issues Report (MIR) was published for consultation on the 2nd April, 2012 and has a submission deadline date of noon on the 25th June, 2012. The consultation process at MIR stage leads into and informs the Local Development Plan which Scottish Border's Council intimates is programmed for publication in the autumn of 2012. This representation to the Main Issues report is considered to be duly made by way of this submission.

The submission has been prepared by Cameron Planning with input from Hunter Architecture, located in Stow. The submission is accompanied by a Transportation Statement prepared by Dougall Baillie Associates.

1.1 Site Location and Description

The site promoted by the Miller Family is land within their ownership in Stow to the immediate west of the former railway line, which is now due to be reinstated as part of the proposed Waverly line to Tweedbank. Stow is scheduled to be provided with a rail halt as part of the new rail line provision. Stow is located north of Galashiels on the A7.

The site is bound to the west by an unclassified public road, which Stagehall Farmhouse and steadings front onto, to the south by agricultural land, by the proposed Borders Rail link to Tweedbank along its eastern boundary and recent residential development to the north at Wedale View.

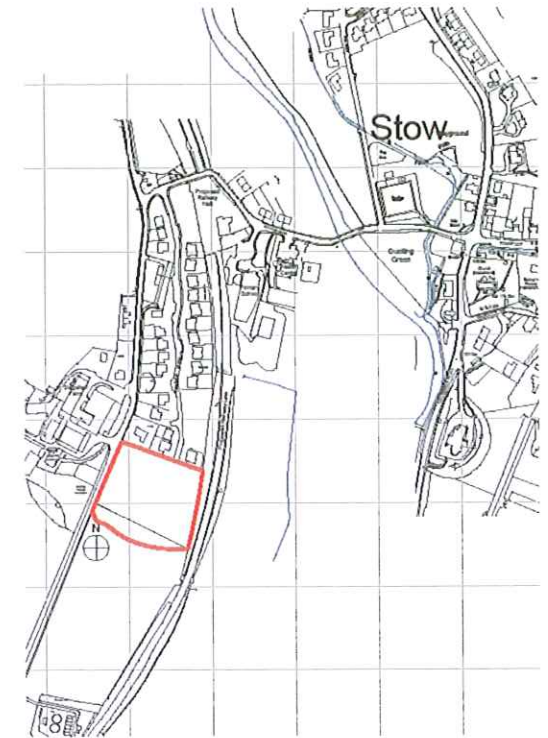
The site is substantially degraded having been previously used as the site compound by Richmond Homes relative to their development to the immediate north. Richmond Homes entered administration and the site compound has been essentially abandoned. The degraded site is visually intrusive. Richmond Homes also utilised the site for the storage of construction materials and top soil. An access has been formed into the site off the public highway and the surface top spoil has been largely stripped with the ground disturbed to a significant extent. A large bund of soil has been left to the west of the site.

As a result of the works undertaken by Richmond Homes during their possession of the site and due to their subsequent administration, the site has remained in an unattractive and derelict state with the appearance of an unfinished building site. The Richmond Homes development is essentially complete, with the remaining plots that had not been developed at the time of administration currently under construction by M&J Ballantyne, Kelso Builders. There is however no likelihood of the site promoted in this submission being tidied, remediated or returned to agricultural use.

The site slopes to the east away from the highway down to the railway line route and has no distinguishing features. The recent housing development by Richmond has no strong boundary with the adjoining land and indeed sits adjacent to the degraded site that comprised their former site compound with open aspects to the south. The consequence of the manner in which the Wedale View site has been developed the provision of a weak and visually poor settlement boundary. The site compound field is bound by a fence line from the highway to railway. There is again no strong defensible boundary between the settlement and the adjoining countryside. Only along the western boundary, adjacent to the highway is there a strong field boundary, existing hedging. The existing access through Wedale View will give access to the proposed development site.



Existing Site



Location Plan

2. **MIR Submission**

We believe that there is an opportunity to provide a form of development that can act as an exemplar development within the Scottish Borders. The site links well with the rest of the settlement and there is sufficient land to provide cycleway and footpath links through the site as well as to consider community focused developments such as allotments, an orchard, picnic area or view point destination.

Andy Miller, on behalf of the Miller family at Stagehall, Stow, submits that the site discussed within these papers should be allocated as a housing site in the new Scottish Borders Local Development Plan. In addition it is maintained that the settlement boundary should be revised at this location to include the proposed development site.

The attached plan prepared by Hunter Architecture shows an indicative layout comprising 16 residential units accessed from the existing access road through the Richmond Homes housing development to the immediate north, via Wedale View. A cyclepath/foot path links through the site to the public highway providing a shortened through route from the settlement centre over the railway bridge through the existing residential development at Wedale View.

As highlighted in Dougall Baillie's Transportation Statement, a proposed new footbridge across the railway line at the new station could also be used to provide a pedestrian link between both sides of the railway. Revised railway plans are unclear on whether a railway footbridge will be provided however if this is the case it shows that the use of the existing road bridge is considered acceptable. The housing layout is indicative in nature and helps identify a site capacity. The number of units that could be accommodated could change, subject to more detailed site analysis.

2.1 Main Issues Report

The Forward to the Main Issues Report recognises that *'change is constant'* and that there is a continued need to keep the planning framework up to date. The Main Issues Report informs the content of the Local Development Plan which in itself must take cognisance of the Strategic Development Plan and other material considerations, including Scottish Planning Policy, Advice Notes and Guidance. With regard to the Scottish Borders, the Scottish Border's Structure Plan will be replaced by the new SESPlan which will be the new Strategic Development Plan for part of Fife, Edinburgh, Lothian and the Borders. SESPlan published their Plan for consultation in the autumn of 2011 and its content has been subject to a high number of objections. The next stage for the Plan is for Examination and consideration of all unresolved objections. Given the level of objections however the complexion and content of the Plan is far from certain and it may be subject to some major changes, including for example the housing land supply figures. It is consequently, wrong for the Scottish Border's Local Development Plan to rely wholly on SESPlan in preparing the LDP.

The MIR notes that between 2010 and 2032 the population of the Borders is expected to grow by 15% and in addition that the number of households is expected to grow by 23% over the same period, both factors leading to an increasing requirement for housing land. The draft SDP and previous Structure Plan identify Strategic Development Areas (SDA) or 'primary development hubs' which will be the focus of development through the life of the SDP. One of the main influences on development is the Borders Railway which is due to be operational in 2014 and includes the provision of a rail halt in Stow. From a sustainable development perspective there is considerable merit in allocating housing land in close proximity to public transport hubs and although the bulk of development will be focused on the SDA's there must be consideration of housing in other locations, more particularly where a rail halt is provided.



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Indicative Layout Plan

2.1 Main Issues Report (cont)

There is a concern that the LDP will merely reflect the SDP in respect of housing land requirements. Whilst the SDP itself reflected the recent Structure Plan requirements it is clear that the provision of housing land is at best modest compared to the requisite provision of a 'generous' supply as outlined in Scottish Planning Policy. Paragraph 2.25 of the MIR advises that no additional housing land is required beyond those sites previously identified to 2019 and that the requirement between 2019 and 2024 is only 'modest'. This includes a supply figure of only 50 units across the whole of the Borders area outwith the SDA's. It is our view that the supply that the Plan makes provision for is far from generous and consequently the Plan conflicts with Scottish Planning Policy.

Paragraph 3.4 of the MIR considers that there is already a generous supply of land identified for housing in the emerging plan but it also recognises that the LDP will need to augment this in line with the SESplan. If SESplan proposes only modest increases and these are replicated in the LDP then the LDP, as with SESplan, fails to meet the principal requirement of Scottish Planning Policy to provide a generous supply of housing land, despite the Council's view that the supply will be generous. In addition, the housing land supply must provide choice in tenure and location.

Whilst the LDP anticipates a 25% affordable housing requirement across the board, 'to help meet local need', there is no evidence as to how this will be delivered, locally, outwith the SDA's. Certainly in the case of Stow there are currently no sites proposed for housing in the LDP either for market or affordable housing. In a community with the provision of a rail halt this is at odds with the Government's sustainable development agenda.

The element of choice in tenure and location is fundamental to Scottish Planning Policy. The inclusion of the site at Stagehall as a housing allocation will provide both market and affordable housing for local people. The attraction of the rail halt at Stow will ensure that the marketability of these units is not in doubt.

One of the listed Main Aims of the LDP is to provide land for mainstream and affordable housing. However, in the case of Stow, the LDP will fail to deliver in its current form.

Section 5 of the MIR relates to Housing. Again, the MIR acknowledges the requirement to provide a 'generous' supply of land for housing. In terms of housing land provision however, the MIR relies on the previous Structure Plan provisions as being adequate; it also states that the new SDP will provide the strategic policy context post 2018. As noted above, the SDP is subject to a number of significant challenges regarding housing land supply and there is significant potential for the position promoted in the SDP to change before or at Examination stage. The SDP will also of course be the Strategic Development Plan for the period from its approval, potentially 2012/13, in fact superseding the previous Structure Plan.

It follows therefore that the position being taken by Scottish Border's Council in the MIR is flawed as it can not reflect the likely changes to housing land supply that will evolve through consideration of the SDP. Most significantly it does not provide for a generous Housing Land Supply.

There is an almost reluctant acceptance in paragraph 5.22 of the MIR that there may be wholesale changes to the SDP position in terms of land supply however the Council dismiss any change through the MIR at this time due to current levels of development. It is not for the Council to speculate on the current or future economic position; they are however obliged to provide for a 5 year housing land supply at any given time.

2.2 SESplan Housing Land Supply Assessment

The current consultation relates to the Scottish Borders Main Issues Report for the emerging Local Development Plan. The MIR however relies heavily on the Housing Land Supply position promoted within SESplan. Although SESplan considers the provision of strategic housing sites it includes a capacity within Scottish Borders outwith the Strategic Development Areas (SDA). By adhering to SESplan, Scottish Borders Council rejects opportunities for other sites to be brought forward or included in the housing supply, including the capacity outwith the SDA's

We have previously made objections to SESplan and believe that Scottish Borders Council is flawed in its approach to rely heavily on SESplan when the Plan is currently subject to considerable objection due to an underestimated housing land requirement and conflict with Scottish Planning Policy. It is noteworthy that the Scottish Ministers have seen fit to object to SESplan and there can be little doubt that it will not survive in its current form in respect of its strategic housing land supply, including its 'modest' supply outwith the SDA's. To ignore sites that are viable, effective and that can be delivered only because they do not appear in the SDP, would be wrong.

We are aware of a number of detailed objections to SESplan in respect of its Spatial Strategy and the analysis undertaken to inform the Housing Land Requirement document that accompanied the Plan, including the Housing Technical Note and the Housing Need and Demand Assessment methodology. It is evidenced that the housing land requirement has been underestimated and that the Spatial Strategy and Strategic Development Areas as defined in SESplan need to be reassessed. The timing of delivery, the inclusion of windfall sites and the inclusion of a relatively high proportion of constrained sites all contribute to a body of objection that has been laid against SESplan.

A likely outcome of the objections to SESplan will be that displaced demand is re-allocated to earlier phases of the Plan thereby increasing an already identified housing shortfall within the Plan area. The implication of deleting the windfall sites and applying reasonable assumptions relative to the level of constrained sites that could be included in the supply analysis resulted in Holder Planning, for example, and others, identifying an increase in this shortfall from 34,200 to 67,700 units, across the SESplan area.

The impact of adjustments to the Spatial Strategy is that the requirement for additional housing land is underplayed. The bulk of identified housing land requirement is defined in SESplan in the period post 2024 and the Plan also fails to demonstrate spatial distribution across the Local Development Plan areas, thereby conflicting with the requirement on the Strategic Development Plan to provide a clear and positive framework for growth, as well as the Scottish Planning Policy requirement to indicate the broad scale and location of housing land across the Plan area within Development Plans.

There is also a need to identify the housing land requirement by Council area, something that SESplan fails to do, in order to monitor and maintain a 5 year land supply.

In summary, the housing land supply position outlined in the SDP is seriously contested. There is every likelihood that the housing land supply figures will change and that this will be reflected in changes to the supply within the SDA's, the supply outwith the SDA's and also the timing of delivery in bringing sites forward to the period to 2024.

The impact of adjustments on the Spatial Strategy is that the requirement for additional housing land is underplayed. The bulk of identified housing land requirement is defined in SESplan in the period post 2024 and it fails to demonstrate spatial distribution across the Local Development Plan areas, thereby conflicting with the requirement on the SDP to provide a clear and positive framework for growth, as well as the Scottish Planning Policy requirement to indicate the broad scale and location of housing land across the Plan area.

There is also a need to identify the housing land requirement by Council area, something that SESplan fails to do, in order to monitor and maintain a 5 year land supply.

2.3 Scottish Ministers' Position on SESplan

We draw attention to the objection to SESplan lodged by the Scottish Ministers relative to the Proposed Plan's Housing Land Requirement section.

The Scottish Ministers state that Scottish Planning Policy (SPP) requires development plans to identify a generous supply of land to meet identified housing requirements across all tenures. Ministers are concerned that the plan will not provide a generous supply. In support of this view, Ministers share the opinion expressed by others that the Plan assumes a *'disproportionate amount of development to happen post 2024'* thereby conflicting with the Scottish Planning Policy requirement to set out housing land requirements over a 12 year period. The Ministers also note that *'windfall sites have been included in the established supply, rather than as an element of additional flexibility, different to that suggested in paragraph 62 of PAN2/2010: Affordable Housing and Housing Land Audits.'*

Ministers make a specific request that the housing land requirement is set out to 2024 in order for the SDP to be SPP compliant.

Ministers also challenge the land allocation figure of exactly 34,200 units as they would *'expect the plan to release more than enough land to meet the housing requirement (i.e. allocate a generous supply). This could be achieved either by increasing the numeric allocation in SESplan or inserting a requirement for LDPs to allocate 'more than' enough sites capable of development within the plan period.'* In our own previous submission to SESplan we had identified a potential shortfall requirement of 67,700 units, considerably higher than the 34,200 units that the Scottish Ministers challenge.

In addition, Scottish Ministers take a view that the Plan does not provide certainty for long-term investment and infrastructure requirements as it is unclear how allocations post 2024 will be made. Furthermore they confirm the position that LDPs can deal with any necessary phasing and that the Ministers do not want to create any unnecessary barriers to sites coming forward earlier than expected.

The objections from Scottish Ministers then will likely result in quite significant changes to SESplan which can not be viewed as it stands, as being fit for purpose. Consequently, this Main Issues Report can be considered flawed to due its reliance on SESplan. There is clearly a requirement for further housing land supply review including an increase in the strategic land requirement, including the provision of sites outwith the SDA's, and, revised phasing as to when sites will be delivered. The inclusion of the site at Stagehall, whilst not in itself a site that can be considered as a strategic land allocation, will provide an element of housing that contributes to the land supply outwith the SDA, will meet local needs and which will also generate developer contribution funding to infrastructure requirements.

2.4 Strategic Assessment

The Strategic Environmental Assessment that accompanies the Main Issues Report includes a short consideration of the promoted site (ASTOW026) and concludes that there is 'minor biodiversity risk' but that the site is constrained in the Landscape Study. In support of the site, it is located close to the train station, primary school and health centre and is within walking distance of the settlement centre. The Council Roads Department do not support an allocation here.

The issue relating to the concern expressed by Roads is addressed more fully in the accompanying statement by Dougall Baillie Associates. With regard to the landscape and visual impact we argue that the site is currently degraded and that there is an opportunity to considerably improve the settlement boundary by introducing structural landscaping/planting, including trees, to the south of the site to both contain the site and to create a stronger settlement boundary. Structural landscaping on the edges of the site will also assist in framing the development and ensuring that the development fits into the existing townscape. The introduction of a through footpath will benefit the community by enhancing access to the hills to the west and contribute to a local footpath network. Dwellings should maximise the southerly aspect of the site to maximise energy sufficiency.

The images that accompany this submission have been prepared by Hunter Architecture, a local Stow based practice and, in our view they demonstrate that the site can be developed without significant adverse impact on the local landscape. Indeed, we argue the opposite, that the development and accompanying landscape strategy will enhance the landscape setting of the settlement. The adoption of a comprehensive landscape strategy will ensure that the development will sit into a well defined village setting.

In respect of the 'minor bio-diversity risk' that the SEA alludes to, it is difficult to see what this relates to given the very poor condition that the site is currently in.

With regard to the concerns expressed by Roads we would highlight the conclusions found in Dougall Baillie's Transportation Statement, that traffic flows and traffic speeds are both very low.



Existing view from the south on A7

Station Road, where it crosses the railway line is sub standard. The highway is however an adopted highway and the proposed development is modest in comparison to the level of development that could be developed within Stow and for which there may be pressure to make provision for given the presence of the rail halt.

It is evident that the number of vehicle trips using the road is relatively small and it is further the case that the addition of 16 additional dwellings will have limited impact. The Primary School, Health Centre, village centre and railway halt are all within walking distance, further reducing the need for vehicular trips. In addition the geometry of the road is such that vehicles travel at very low speed. Dougall Baillie's Report considers these matters in more detail.

Roads also expressed concern that development of the site would not comply with Designing Streets. Dougall Baillie (DBA) however, in their Statement, advise that the indicative layout prepared for this submission would still enable the principles of Designing Streets to be adhered to. The issue of the perceived 'substandard' footway provision across the railway bridge can be addressed by the proposed footbridge provision at Stow Station.

In summary it is the view of DBA that the likelihood of vehicles meeting on a section of road with substandard geometry is limited and this is borne out by the traffic survey information. The low speeds recorded along this road also underline that the consequences from two cars meeting would be negligible. The impact of traffic generation on the surrounding road network will also be negligible.

2.4 Site Analysis

Scottish Border's Council has assessed the site in preparing the MIR and has previously expressed a view that the site is difficult to access and that development of the site would have a potentially adverse impact on the landscape setting of Stow.

In respect of site access, Miller Family has instructed Dougall Baillie Associates to prepare a Statement to examine an access strategy for the site and which specifically addresses the issue of vehicular access via Station Road.

The Council's Roads Authority has expressed a view that the bend on



Indicative view from the south on A7



Indicative view from the north on Quaiting Green



Indicative view from the south on unclassified road

2.4 Site Analysis (cont)

In addition, the Council has highlighted a potentially adverse impact on landscape setting. The current scenario however is that the views from the southern approach towards Stow, and specifically Stagehall clearly take in the existing residential development and the derelict field in the foreground. The settlement boundary at this location is weak and inadequate.

Stow based architectural practice Hunter Architecture have been commissioned by the Miller Family to prepare an indicative site layout and also to consider the issue of visual impact. The accompanying layout, whilst indicative, shows that the site can easily accommodate 16 residential units. A greater density of housing could indeed increase this figure. A key aspect of the analysis however is the accompanying views towards the site. These show that the settlement boundary can be made more robust through landscaping and tree planting to ensure that the proposed development, and equally the existing recent development, will be drawn into the community and will be seen as part of the existing settlement. This is preferable to the current scenario where an open aspect is currently portrayed with no thought given to settlement boundaries.

As the development opportunity is progressed, the proposed development design and layout will be supported by a comprehensive landscaping scheme and other studies that may be required.

Another aspect of the proposed development is the provision of a footpath and cycle path link from the Station or Station Road, through the site to the public highway beyond. This local footpath



Existing view from old bridge on A7



Indicative view from old bridge on A7

network will tie in to a proposed picnic area to the immediate south, adjacent to the highway at an elevated position, providing a focal point for locals to walk to.

The Miller Family has ties to the local school and provide access to a woodland area adjacent to Stagehall Farm where school pupils can view local wildlife and experience nature at close hand. There is an opportunity to provide a more formal access arrangement to allow school pupils to also access the land to the south of the residential development, within a controlled area, where pupils could have access to allotments for example. Indeed the provision of allotment space could be extended to the wider local community.

In summary, the transport and access issue is we feel one that has been overplayed. The level of traffic use and speed of traffic is very low and the road geometry itself controls traffic movement. The landscape impact has also we feel been overplayed by the Council as there is an opportunity to improve the settlement boundary at this location and ensure that the boundary becomes more robust and defensible.

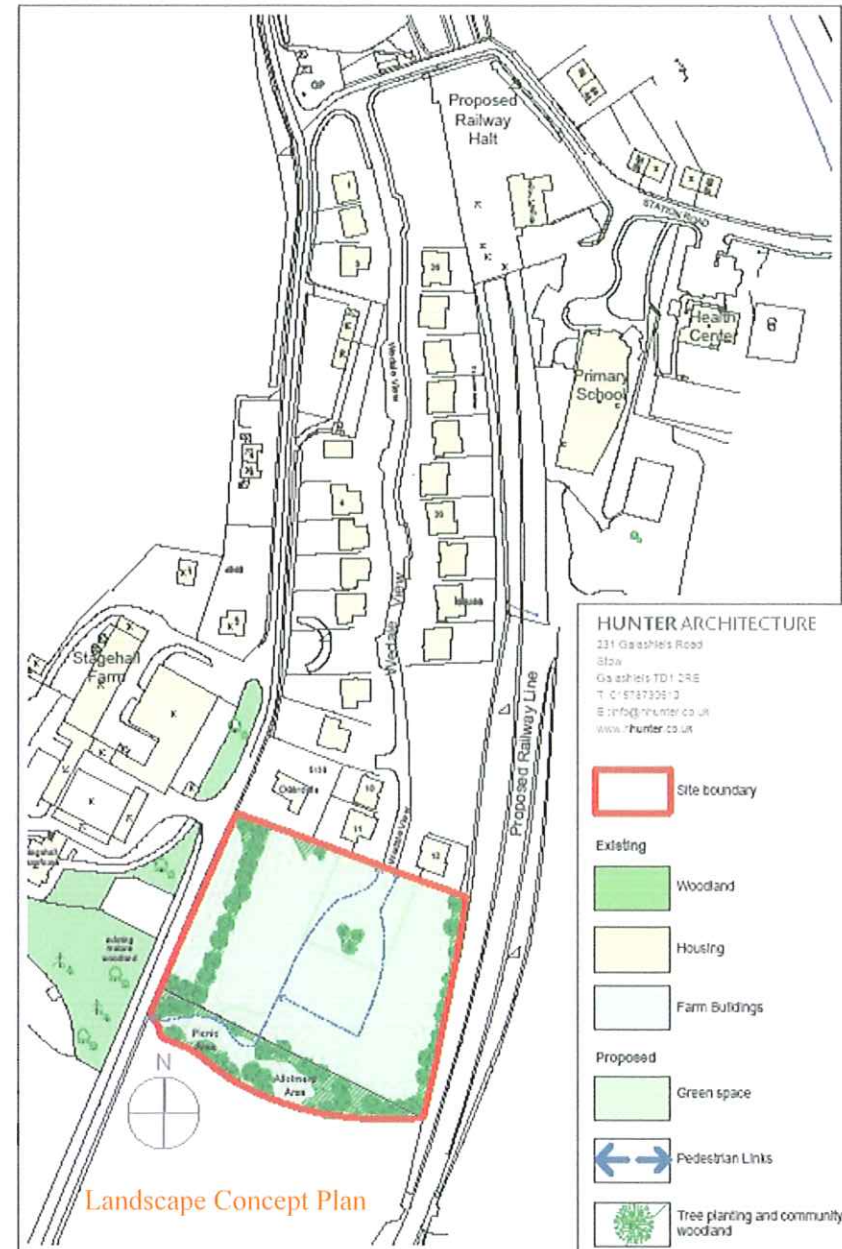
2.6 Response to Issues

With regard to the specific questions outlined in the MIR we would provide the following responses.

Question 7 of the MIR asks ‘do you agree with the preferred option for the scale of additional housing land in the LDP or do you agree with the alternative option? In response to this issue we believe that the alternative option should be the preferred option, that is, that scale of housing land should be increased from that set out in the SDP.

Question 8 of the MIR asks ‘do you agree with the preferred options for additional housing sites in Appendix A, do you agree with any of the alternative options, or do you have alternative options? In response to this issue we advise that the site at Stagehall in Stow should be allocated as a housing allocation in the LDP, thereby providing additional housing opportunity in Stow at a location that is wholly sustainable, is within walking distance of the local primary school, health centre and village centre and is essentially adjacent to the proposed rail way station at Stow. In addition, assuming that the 25% affordable housing requirement will apply across the board, the development site will provide affordable local housing within an existing settlement. We promote the alternative or additional option of Stagehall as a housing allocation site.

Question 9 relates to the provision of affordable housing at 25% or an alternative scenario of reviewing the provision to reflect the current economic position. Our response is that the requirement should reflect current economic restraints however the issue of affordable housing needs further consideration as to how this can be delivered. Low cost housing in a location such as Stow will be attractive to the local market and ensure that the housing offer is wide. A straightforward 25% social needs provision for example could mean people from outwith the settlement being relocated to Stow. Our view is that housing provision for local people is preferable. The requirement for any affordable housing policy must also be evidence based.



3. Summary and Conclusions

This Planning Statement has been prepared on behalf of the Miller Family and comprises their submission to the Council in support of the inclusion of their land at Stagehall Farm as defined within this document as a housing land allocation within the new Local Development Plan.

From a planning policy point of view there is evidently a significant reliance on the emerging SDP, SESplan, to inform the LDP. SESplan has however been subject to a significant body of objection, particularly in respect to its housing land supply, including objections from the Scottish Ministers and, its content may well change in the course of the coming months. One of the changes will likely be an increase in the housing land supply requirement, including a requirement for an increased allocation outwith the Strategic Development Areas which would mean a requirement to find additional sites for development. The timing of site delivery is also challenged, which will likely result in an increase in the housing land requirement to 2019.

In principle, as the Stagehall Farm site is situated on the edge of an existing settlement, is within walking distance from a new rail halt to be provided in Stow on the Borders Waverly line and is within walking distance of the local Primary School, Health Centre and Village centre, there is considerable merit in allocating the site as one that would contribute to the housing land supply.

Scottish Border's Council has however rejected the inclusion of the site at Stagehall Farm, Stow, on the basis of bio-diversity impact, landscape impact and concerns raised by Roads. The site is extensively degraded and sits adjacent to an existing recent housing development. The site's bio-diversity will be poor. Any impact on landscape setting can be mitigated by a comprehensive landscape strategy to ensure that the site 'fits' into the existing settlement. Without investment in the site to improve its visual impact it will remain as an adverse visual intrusion, particularly when viewed from the south, heading north on the A7 and from views across from the A7. The introduction of tree planting, as shown in Hunter Architecture's images, will ensure that the current visually poor contribution will be enhanced considerably.

Although the site is not included within the green belt the principles of green belt boundary review are appropriate to consider in respect of this submission. There is a need to ensure that settlements have defensible and robust settlement edges in order to prevent adverse visual intrusion and detriment to the landscape setting. By enhancing settlement fringes, including through the provision of an improved form of development and accompanying landscaping, harsh settlement fringes can be softened and new development can be developed within a framework of screening and planting. Stow is a settlement that fits into its landscape well, the new development at Wedale View being an exception where the southern boundary has been left poorly defended and essentially open.

The proposed development is not a large development, yet if planned correctly and adopting a sensitive approach to urban fringe development, including the provision of a landscape strategy, it can positively contribute to the settlement 'fit'. Above all else it would provide much needed local housing ensuring that an appropriate range of housing is provided including low cost affordable housing for first time buyers.

With regard to the Roads issues, Dougall Baillie Associates Transportation Statement demonstrates that traffic flow and traffic speeds are both extremely low. This fact alone demonstrates that the likelihood of traffic meeting on the small section of sub standard road is negligible, including with the additional development built, and the consequences from any meeting of vehicles similarly negligible. DBA highlight the fact that existing services are all within walking distance from the site, reducing demand for car based travel; the provision of the new rail way halt and existing bus services, can also result in reduced car based travel. There is all likelihood that once the rail halt is open in 2014 that bus services could tie in with train times, bringing public buses closer to the development site. There is little likelihood that the development would have an impact on the local road network.

In response to the specific questions asked in the Main Issues Report we disagree with the preferred option expressed under Question 7 in respect of housing land and hold the view that the scale of housing land should be increased beyond that shown in the SDP. With regard to Question 8 we disagree with the preferred option identifying additional housing sites and the alternative sites option on the basis that the site at Stagehall Farm, Stow, should be include in the LDP as a site that will contribute to the housing land supply requirement. We would also emphasise that in relation to Question 9, relative to affordable housing, that any requirement for an affordable housing allocation must be based on evidence as required in Scottish Planning Policy, whether this is at the 25% figure promoted in the Plan or at any alternative revised figure.

We strongly believe that there is an opportunity to provide a relatively modest development in a location where a new train station will see increased pressure for land to be released for housing. The site promoter, being a local landowner, is keen to see a development that works well with the existing community and fits into the landscape and village setting. The landowner is also happy to expand on an existing relationship with the local primary school by allowing children access to an area of land that could be developed as allotment space, and idea that could be developed further with the local community through allotment, orchard or picnic space and a viewpoint access by way of a new footpath and cyclepath link that will link with existing networks.

In summary we ask that Scottish Border's Council revises the settlement boundary at Stow and identifies the site promoted in this submission as a housing allocation site.